

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:

Sebastian Janssen

Serial No.: 10/825,991

Filing Date: April 16, 2004

For: Asymmetrical Accounting for a Stable
Value Investment Product

Examiner: WONG, Eric

Art Unit: 3693


Confirmation No.: 8735

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C.F.R. 1.6(a)(4)

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Dated: September 11, 2008

Signed:


Lekha Gopalakrishnan

AMENDMENT AND RESPONSE TO NON-FINAL OFFICE ACTION

Mail Stop Amendment
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

In response to the Non-Final Office Action mailed March 11, 2008, Applicant respectfully responds as follows. This response is being filed on or before September 11, 2008 along with a Petition for Three-Month Extension of Time and requisite fees. Although the Applicants do not believe any additional fees are required, the Commissioner is authorized to charge any additional fees that may be required, or credit any overpayment to Deposit Account No. 50-0310 (Docket No.: 064385-5012-US).

Amendments to the Claims begin at page 2 of this Paper.

Remarks begin at page 5 of this Paper.